Case 2:22-cv-01942-TLN-DB Document 19 Filed 01/30/23 Page 1 of 3 1 ELIZABETH J. LOW (SBN 308098) 601 Marshall Street 2 Redwood City, CA 94063 Tel.: +1 650 752 3100 3 Fax: +1 650 853 1038 ELow@goodwinlaw.com 4 ALYSSA A. SUSSMAN (pro hac vice) 5 620 Eighth Avenue New York, NY 10018 6 Tel.: (212) 459-7284 Fax.: (617) 801-8854 7 ASussman@goodwinlaw.com 8 GOODWIN PROCTER LLP Attorneys for Defendant 9 Select Portfolio Servicing, Inc. 10 Additional counsel listed below 11 UNITED STATES DISTRICT COURT 12 EASTERN DISTRICT OF CALIFORNIA 13 SACRAMENTO DIVISION 14 15 VERONICA PEREZ, individually and on Case No. 2:22-cv-01942-TLN-DB 16 behalf of all others similarly situated, THIRD STIPULATION FOR 17 Plaintiff, EXTENSION OF TIME AND ORDER 18 v. 19 SELECT PORTFOLIO SERVICING, INC., 20 Defendant. 21 22 23 24 25 26 27 28

THIRD STIPULATION FOR EXTENSION OF TIME AND ORDER CASE NO. 2:22-cv-01942-TLN-DB

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1	Pursuant to Civil Local Rule 144(a), Plaintiff Veronica Perez ("Plaintiff") and Defendan		
2	Select Portfolio Servicing, Inc. ("Defendant") (together, the "Parties"), by and through their		
3	respective attorneys, stipulate as follows:		
4	WHEREAS, Plaintiff filed her Complaint on October 27, 2022 (see Dkt. No. 1);		
5	WHEREAS, Plaintiff served the Complaint on Defendant on October 28, 2022 (see Dkt.		
6	No. 5);		
7	WHEREAS, the Parties submitted two previous requests for an extension of time for		
8	Defendant to answer, move, or otherwise respond to the Complaint, which the Court granted on		
9	November 16, 2022 and January 9, 2023 (see Dkt. Nos. 7, 8, 13, 14);		
10	WHEREAS, the current deadline for Defendant's response to the Complaint is February		
11	17, 2023 (see Dkt. No. 14);		
12	WHEREAS, there is good cause for a further extension of time for Defendant to answer,		
13	move, or otherwise respond to the Complaint as the Parties continue to engage in discussions		
۱4	regarding case issues, allegations, and defenses, which discussions have taken longer than		
15	expected due to unanticipated issues, and the additional extension will allow time for the Parties		
16	to pursue those discussions further and avoid time and expense that may prove to be unnecessary		
17	based on those discussions.		
18	NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT, subject to		
19	the Court's approval:		
20	1. The deadline for Defendant to answer, move, or otherwise respond to the		
21	Complaint shall be extended through and including March 31, 2023;		
22	2. In the event that Defendant files a motion in response to the Complaint,		
23	Plaintiff shall file any opposition to the motion by not later than May 5,		
24	2023; and		
25	3. Defendant shall file any reply to the opposition by not later than May 31,		
26	2023.		
27	IT IS SO STIPULATED.		
28			

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2	Dated: January 30, 2023	Respectfully submitted,
3		By: /s/ Alyssa A. Sussman
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10		ASussman@goodwinlaw.com
11		GOODWIN PROCTER LLP
12		Attorneys for Defendant Select Portfolio Servicing, Inc.
13	Dated: January 30, 2023	Respectfully submitted,
14		
15		By: <u>/s/ Joel D. Smith (with permission 1.27.23)</u> L. TIMOTHY FISHER (SBN 191626)
16		JOEL D. SMITH (SBN 244902)
17		BURSOR & FISHER, P.A. 1990 North California Boulevard, Suite 940
18		Walnut Creek, CA 94596 Tel.: (925) 300-4455
19		Fax: (925) 407-2700 ltfisher@bursor.com jsmith@bursor.com
20		•
21		Attorneys for Plaintiff Veronica Perez
22		
23		<u>ORDER</u>
24	IT IS SO ORDERED.	
25	11 15 SO OKDEKED.	\mathcal{A} () \mathcal{A}
26	DATED: January 30, 2023	My - lander
27		Troy L. Nunley United States District Judge
28		2